

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

THE WEST VIRGINIA COALITION AGAINST
DOMESTIC VIOLENCE, INC.,

Plaintiff,

v.

PATRICK J. MORRISEY, in his official
capacity as Attorney General for the
State of West Virginia,

Defendant.

Civil Action No. 2:19-cv-00434
(Judge John T. Copenhaver, Jr.)

MOTION TO FILE DOCUMENTS UNDER SEAL

Plaintiff, the West Virginia Coalition Against Domestic Violence, Inc., hereby moves the Court, pursuant to the Stipulated Protective Order entered on October 22, 2019 (Dkt. 25), as well as the Federal Rule of Civil Procedure 5.2(d) & (f) and Local Rule 26.4(c), for an order permitting unredacted versions of the following documents to be filed under seal in connection with Plaintiff's motion for summary judgment:

- Declaration of the Executive Director of Program A, with Exhibits 1-6
- Declaration of the Executive Director of Program B, with Exhibits 1-3
- Declaration of the Executive Director of Program C, with Exhibits 1-3
- Declaration of the Director of Program D
- Table of Domestic Violence Program Pseudonyms

These documents contain sensitive information concerning the Programs' security policies, procedures, and measures. Public disclosure of these details could jeopardize the security of those programs and the people living and working at their facilities. Pursuant to the October 22, 2019

Stipulated Protective Order, Plaintiff has already publicly filed redacted copies of these documents, attached to its Motion for Summary Judgment, with identifying information concerning domestic violence programs and domestic violence program employees removed. The attached Table of Pseudonyms, to be filed under seal, can be used to identify these programs. Because the security threat posed to the domestic violence programs referenced in these documents is expected to continue indefinitely, Plaintiff asks that the unredacted versions of these documents be filed under seal for an indefinite duration.

Respectfully submitted,

/s/ Lucas R. White

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**Pro hac vice*

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CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2021, I served a true and exact copy of the foregoing Motion to File Documents Under Seal, and all documents attached to it, upon all counsel of record via electronic mail.

/s/ Lucas R. White

Lucas R. White

*Counsel for Plaintiff The West Virginia
Coalition Against Domestic Violence, Inc.*